

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)	
)	
Plaintiff,)	
)	
v.)	Misc. No. 17-151-LPS
)	
BOLIVARIAN REPUBLIC OF)	
VENEZUELA,)	
)	
Defendant.)	

SPECIAL MASTER’S PROPOSED ADDITIONAL DEADLINES FOR DISCOVERY

Robert B. Pincus, in his capacity as special master for the United States District Court for the District of Delaware in the above-captioned case (the “**Special Master**”),¹ has met and conferred with the relevant parties and respectfully submits this proposed schedule in accordance with the Court’s May 30, 2025 Oral Order, D.I. 1780.² An asterisk denotes a deadline previously set by the Court in that Oral Order.

Event	Special Master’s Proposed Date	Rec. +
*Deadline for the Special Master to submit his Final Recommendation	June 27	N/A
Deadline to serve written discovery on the party (or parties) whose bid is selected as the Final Recommendation	June 30	+3
*Deadline for the filing of any objections to the Special	July 3	+6

¹ All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the *Sixth Revised Proposed Order (A) Establishing Sale and Bidding Procedures, (B) Approving Special Master’s Report and Recommendation Regarding Proposed Sale Procedures Order, (C) Affirming Retention of Evercore as Investment Banker by Special Master and (D) Regarding Related Matters* (D.I. 481) (the “**Sale Procedures Order**”).

² This proposed schedule reflects the Special Master’s best efforts to take into consideration the various, and at times competing, concerns of the relevant parties. The Special Master understands that the Venezuela Parties plan to move for an adjournment of the Sale Hearing.

Event	Special Master's Proposed Date	Rec. +
Master's Final Recommendation		
Opening expert reports due	July 3	+6
Deadline for any Competing Objector to disclose its own bid materials (such materials to be commensurate with those disclosed by the Special Master of the recommended bid) ³	July 3	+6
Deadline to serve written discovery on a Competing Objector	July 5	+8
Deadline to serve responses and objections for discovery requests served after the Final Recommendation	July 8	+11
Deadline to meet and confer regarding the scope of discovery to be produced in response to discovery requests served after submission of the Final Recommendation	July 9	+12
Deadline to serve witness disclosures pursuant to FRCP 26(a)(3)	July 9	+12
Deadline to notice witness depositions	July 10	+13
*Deadline for the filing of responses to objections to the Special Master's Final Recommendation	July 11	+14
Deadline to complete document productions in response to discovery requests served before the date this schedule is entered ⁴	July 11	+14
Deadline to serve responsive expert reports	July 13	+16
Deadline to substantially complete document productions in	July 14	+17

³ A Competing Objector is any party objecting to the Final Recommendation on the basis that its bid should have been selected as the Final Recommendation instead.

⁴ First, as to the Special Master's production, this is a targeted deadline because the Special Master plans to collect, review, and produce documents created through June 27.

Second, because this deadline falls on the same day that responses to objections to the Special Master's Final Recommendation are due, a party does not, merely by failing to cite a document produced by another party on or immediately before July 11 (and to which the receiving party otherwise did not have access), waive the right to make an objection in its reply brief or at the Sale Hearing based on that document. For the avoidance of doubt, this footnote does not preclude a party from objecting to another party's invocation of or reliance on any document for any reason.

Event	Special Master's Proposed Date	Rec. +
response to discovery requests served after the date this schedule is entered	by 2:00pm ET	
*Deadline for the filing of replies regarding any objections to the Special Master's Final Recommendation	July 16	+19
Deadline to serve reply expert reports, if any	July 16	+19
*Deadline for the Special Master to submit Joint Status Report ⁵	July 16	+19
*Conclusion of the discovery period	July 18	+21
Deadline to disclose exhibits pursuant to FRCP 26(a)(3)	July 19	+22
Deadline to serve objections to FRCP 26(a)(3) exhibit disclosures	July 21	+24
*Commencement of the Sale Hearing	July 22	+25

⁵ The Court previously ordered that the Special Master's Joint Status Report should include a witness list and allocation of time across parties. D.I. 1741 ¶ 3.

Respectfully submitted,

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

Matthew S. Barr (Admitted *pro hac vice*)
David Lender (Admitted *pro hac vice*)
Jared R. Friedmann (Admitted *pro hac vice*)
Chase A. Bentley (Admitted *pro hac vice*)
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Matt.Barr@weil.com
David.Lender@weil.com
Jared.Friedmann@weil.com
Chase.Bentley@weil.com

By: /s/ Myron T. Steele

Myron T. Steele (#0002)
Matthew F. Davis (#4696)
Bindu A. Palapura (#5370)
Hercules Plaza, 6th Floor
1313 North Market Street
P.O. Box 951
Wilmington, DE 19801
Telephone: (302) 984-6000
Facsimile: (302) 658-1192
msteele@potteranderson.com
mdavis@potteranderson.com
bpalapura@potteranderson.com

Counsel for Special Master Robert B. Pincus

Dated: June 3, 2025
12272919 / 21202.00001